

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Comcast of Massachusetts/New) Case No.: 04 11242 REK
Hampshire/Ohio, Inc.)
Plaintiff,) PLAINTIFF'S MOTION TO EXTEND
vs.) TIME TO MOVE FOR DEFAULT
Defendant) JUDGMENT

Maureen & James McDonough)
)

NOW COMES Plaintiff in the above-captioned case and respectfully requests that this Court extend the deadline for the Plaintiff to move for Default Judgment to March 11, 2005.

As grounds, the Plaintiff states:

1. Plaintiff's Counsel's office records indicate that they have been contacted by an attorney for the Defendants in this case.
2. Plaintiff's counsel recently called the defense attorney to present the Plaintiff's current settlement stance in this matter but he was not able to discuss the current settlement proposal with the defense attorney.
3. With additional time the parties may be able to negotiate an amicable resolution to this matter.
4. An additional 30 days should be more than sufficient to determine if an amicable resolution is possible
5. In light of these circumstances, the Plaintiff is seeking an extension of time to March 11, 2005 before it must to move for Default Judgment against these Defendants.

In further support of this motion, see affidavit of John M. McLaughlin

Respectfully Submitted for the Plaintiff,
By Its Attorney

2/15/05
Date

/s/ John M. McLaughlin
John M. McLaughlin (BBO: 556328)
Green, Miles, Lipton & Fitz-Gibbon
77 Pleasant Street
P.O. Box 210
Northampton, MA 01061-0210
(413) 586-0865

CERTIFICATE OF SERVICE

I, John M. McLaughlin, attorney for the Plaintiff, hereby certify that on the 15th day of February 2005, a copy of the foregoing motion and affidavit were sent via first class mail to Maureen and James McDonough
4 Carl Road
Walpole, MA 02081

/s/ John M. McLaughlin
John M. McLaughlin